

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

JUDY JIEN, *et al.*,

Plaintiffs,

v.

PERDUE FARMS, INC., *et al.*,

Defendants.

Case No. 1:19-cv-2521-SAG

**DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION FOR LEAVE TO FILE
THIRD AMENDED CONSOLIDATED COMPLAINT**

Defendants Perdue Farms, Inc., Perdue Foods LLC, Tyson Foods, Inc., Keystone Foods, LLC, Sanderson Farms, Inc., Koch Foods, Inc., Wayne Farms, LLC., Mountaire Farms, Inc., Fieldale Farms Corporation, Butterball, LLC, Jennie-O Turkey Store, Inc., Cargill Meat Solutions Corporation, and Agri Stats, Inc., do not oppose Plaintiffs' Amended Motion for Leave to File Third Amended Consolidated Complaint (ECF 567), whereby Plaintiffs seek leave to file the proposed Third Amended Consolidated Complaint ("TAC"), subject to Defendants' reservation of all rights and preservations of all defenses.

Defendants' non-opposition is not intended to and should not be construed as an express or implied waiver or limitation of any of Defendants' defenses, arguments, rights, claims, or remedies in connection with this matter. In particular, Defendants reserve all rights to contest the sufficiency of Plaintiffs' allegations pursuant to Rule 12 of the Federal Rules of Civil Procedure

and to challenge the merits of Plaintiffs' allegations. Defendants also reserve all rights to object to and challenge any additional discovery requests propounded by Plaintiffs based on the new allegations in the TAC and to seek appropriate extensions to the case schedule.

Date: February 4, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 4th day of February 2022, Defendants' Statement of Non-Opposition to Plaintiffs' Motion for Leave to Amend Complaint and Reservation of Rights was served via the Court's CM/ECF system on all counsel of record in accordance with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of Maryland.

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